

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

**UNITED STATES OF AMERICA, \***

**v. \* CASE NO. 2:06cr214-MEF-VPM-1**

**DANIEL L. PLATT. \***

**MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

Comes now the Daniel L. Platt by and through undersigned counsel and files this motion requesting an extension of time until the close of business on September 25, 2006 to file his pretrial motions and in support thereof states the following:

1. The Court's order directed pretrial motions to be filed by September 23, 2006, a Saturday. Counsel was unable to complete for e-filing on September 23, 2006 Platt's motion to suppress. Counsel was traveling and relying on an Alltell Aircard to access the internet. The card temporarily failed due to poor wireless service.

2. Based on the above Counsel needs until 5:00 p.m., September 25, 2006 to complete the motion for filing. It is respectfully requested that this brief enlargement of time be granted.

Respectfully submitted,

s/Susan G. James  
SUSAN G. JAMES

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 25, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Tommie Hardwick  
Assistant United States Attorney  
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